

# Exhibit “A”

**Courtney Ehrhart**

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**From:** Allison Doucette  
**Sent:** Thursday, January 28, 2016 2:45 PM  
**To:** John Anthony; Courtney Ehrhart  
**Subject:** This was my draft e-mail that was not sent due to early maternity leave -- Savannah/Martino - Follow up on Discovery - Good Faith Conference - Follow Up on Mediation  
**Attachments:** Savannah Capital\_Martino, Thomas S. - (Doc 37) - Martino Amended Responses to RFP.pdf

Lee,

I would like to follow up on the Debtor's discovery responses. We have not received the documents that the Debtor agreed to produce. Please advise when and in what form we can receive those. I am available to review and pick them up next week if they are at your office, etc.

Additionally, most of the requests were objected to. We do not believe the objections are well taken and intend to file a motion to compel. Please let us know if you will agree to any resolution of the objections.

Finally, the judge ordered us to mediation. I think the goal was to obtain the information from the discovery prior to attending mediation so that we could have a more productive process. The current deadline is January 15, 2015. Please advise as to when we can expect the discovery responses so that we can come up with a realistic timeframe for moving the mediation deadline with the Court.

I look forward to hearing from you.

Thanks,  
Allison

**Allison Doucette, Esq.**

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